

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: )  
 ) CHAPTER 7  
RUSSELL SMITH )  
SHARON RUTH SMITH ) CASE NO: 22-50823-KMS  
DEBTOR )

**LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY BY ROCKET  
MORTGAGE LLC, FKA QUICKEN LOANS, LLC**

Comes now Rocket Mortgage LLC, fka Quicken Loans, LLC, by and through counsel, and responds to the Debtor's motion to sell real property as follows:

1. Debtors' motion states that Debtor has a contract to sell the property for one hundred forty thousand dollars (\$140,000.00).
2. The motion states that the loan shall be paid in full from the proceeds.
3. Movant objects solely to the extent that its mortgage must be paid in full pursuant to a current payoff at the time of the closing.
4. If the debt is not paid in full, movant reserves its right to maintain the lien on the property until such time as the debt is paid in full.

WHEREFORE, Movant prays that the motion be denied unless the conditions in the above response are met.

McCalla Raymer Leibert Pierce, LLC

By: /s/Elizabeth Parrott  
Elizabeth Parrott  
MS Bar No.  
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**CERTIFICATE OF SERVICE**

I, Elizabeth Parrott, of MCCALLA RAYMER LEIBERT PIERCE, LLC, 1544 Old

Alabama Rd, Roswell GA 30076, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age,

That on the date below, I served a copy of the within LIMITED RESPONSE TO MOTION TO SELL filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Debtors' Attorney

Thomas Carl Rollins, Jr

Served via ECF: [trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)

and the following by regular U.S. Mail addressed to:

Trustee

Derek A Henderson T1

1765-A Lelia Drive

Suite 103

Jackson, MS 39216

Debtors

RUSSELL SMITH

SHARON RUTH SMITH

176 Browns Bridge Rd

Purvis, MS 39475

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on 09/09/2022  
(date)

By: /s/Elizabeth Parrott  
Elizabeth Parrott  
MS Bar No.  
Attorney for Creditor